



Clean Harbors Environmental Services, Inc.  
2549 North New York Avenue  
Wichita, KS 67219  
(316) 269-7400

RECEIVED

APR 03 2008

KDHE  
Hays District Office

March 31, 2008

Ms. Karen Schmidt  
Kansas Department of Health and Environment  
Northwest District Office  
Division of Environment – Waste Management Program  
2301 E. 13<sup>th</sup>  
Hays, KS 67601-2651

**RE: Description of corrective actions taken at Clean Harbors Kansas, LLC.**

Ms. Karen Schmidt:

This letter is to provide your agency with a description of the corrective actions taken regarding the items noted on the Notice of Compliance/Non-Compliance issued by you on March 18, 2008.

**The Notice listed one violation: A portion of the concrete secondary containment berm in Building C was broken.**

The repairs to this section of berm wall were completed on March 31, 2008. The damaged section was repaired by removing all loose concrete and re-pouring the damaged section with concrete. Clean Harbors Wichita had identified the damaged berm wall as a structural defect which required immediate attention, and a Work Order had been initiated prior to your inspection visit. Clean Harbors Wichita would like to point out that the portion of the containment berm which was damaged was an interior wall that serves to create isolated containment areas within Building C. This defect did not compromise the integrity of the buildings outer perimeter containment walls by allowing a spill to spread outside of Building C. The two interior storage areas separated by the damaged berm wall were not designated to segregate incompatible wastes. And finally, Clean Harbors Wichita was not actively using the two storage areas adjoining the damaged berm for storage of hazardous wastes while the berm wall was damaged. Clean Harbors Wichita acknowledges that the damaged berm wall was a serious deficiency which required prompt repair. However, the primary perimeter berm wall containment system in Building C was not compromised, and this situation did not constitute a danger to any persons or the environment in the area.



Additionally the notice of Compliance/Non-Compliance listed three other Comments/Concerns:

**1) Rainwater had entered Building I through a leaking roof:**

The Clean Harbors Engineering Services Manager initiated a CAF (Capital Accusation Fund) request to have the roof on Building I repaired in late February 2008. The CAF was approved and requests for bids to repair the roof in Building I were issued in early March 2008. Roof Mechanics, Inc., has been selected to perform the work, with a start date of mid April 2008 (weather permitting). Clean harbors Kansas intends to have the roof on Building I repaired as soon as possible.

**2) Natural Gas odor was present in Building I:**

The local natural gas provider was contacted immediately and inspected and repaired the natural gas lines in Building I on March 19, 2008. This issue has been resolved.

**3) The Satellite Drum Lid for hazardous PPE was damaged/bent:**

To date, we have not been able to purchase a suitable satellite drum lid that has a rubber seal to limit the escape of VOCs from the drum. Clean Harbors Kansas is continuing to search for a suitable drum lid. If a suitable drum lid cannot be located, we are prepared to fabricate a lid that will meet the intended service requirements.

If you have any additional comments or questions regarding these matters, or the Clean Harbors Kansas Facility, please contact either of the two individuals listed below:

Mr. James Matthew Noble  
Plant Facility Manager  
Clean Harbors Kansas, LLC  
Office phone: (316) 269-7418  
E-mail: [noble.james@cleanharbors.com](mailto:noble.james@cleanharbors.com)

Or,

Mr. Lee R. Grater  
Sr. Facility Compliance Manager  
Clean Harbors Lone Mountain, and Clean Harbors Kansas  
Office Phone: (580) 697-3520  
E-mail: [grater.lee@cleanharbors.com](mailto:grater.lee@cleanharbors.com)

Thank you for your time and attention to this mater.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lee Grater', with a stylized flourish at the end.

Lee Grater  
Sr. Facility Compliance Manager